

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO. 03-12499 MLW**

**TERRI L. PECHNER-JAMES )  
and SONIA FERNANDEZ )  
Plaintiffs )  
)  
VS. )  
)  
CITY OF REVERE, THOMAS )  
AMBROSINO, MAYOR, CITY )  
OF REVERE POLICE DEPT. )  
TERRENCE REARDON, CHIEF )  
OF POLICE, BERNARD FOSTER )  
SALVATORE SANTORO, ROY )  
COLANNINO, FREDERICK )  
ROLAND, THOMAS DOHERTY )  
JOHN NELSON, JAMES RUSSO )  
MICHAEL MURPHY and )  
STEVEN FORD )  
Defendants )**

**REQUEST FOR ENLARGEMENT OF TIME**

Now comes the Plaintiffs and request that this Honorable Court grant them an enlargement of time to secure expert reports and disclosures. The Plaintiffs state the following as grounds for their request;

1. On March 3, 2006, the Court allowed the Plaintiffs until March 30, 2006 to submit expert reports and disclosures.
2. The Plaintiffs have contacted two experts on Post Traumatic Stress Disorder and one expert on damages. The experts on Post Traumatic Stress Disorder are:

Dr. John Daignault  
Psychological Services, Inc.  
222 Forbes Road, suite 105  
Braintree, MA 02184 (See Attached Exhibit A.)

Valerie Duggan, LICSW  
Dr. Hayden Duggan  
On Site Academy

Gardner, MA 01440 (**See Attached Exhibit B.**)

The expert on damages is;

Dr. Richard Siegel, Ph.D.

Applied Economics Incorporated

1 Westinghouse Plaza

Boston, MA 02136 (**See Attached Exhibit C.**)

3. The Plaintiffs have provided the experts with documents and written materials and the experts have requested additional time to interview the Plaintiffs and prepare thorough reports.

WHEREFORE, the Plaintiffs request an additional sixty (60) days to secure the reports and disclosures ordered by the court on March 3, 2006.

Terri Pechner-James and

Sonia Fernandez

By their attorney

/s/ James S. Dilday, Esq.

James S. Dilday, Esq.

27 School Street, Suite 400

Boston, MA 02108

(617) 227-3470

**EXHIBIT A**

**EXHIBIT B**

**EXHIBIT C**